

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RENEE C. ELVIRA and EDWIN RUIZ;	Plaintiffs;)	CIVIL ACTION
)	
)	File No. 15-cv-7291
)	
	v.)	JURY TRIAL DEMANDED
OCWEN LOAN SERVICING, LLC;)	
)	Honorable Matthew F. Kennelly
	Defendant.)	

JOINT STATUS REPORT ON DISCOVERY

Pursuant to this Court's order dated June 21, 2016 [DKT #67], Plaintiffs Renee Elvira and Edwin Ruiz ("Ruiz") and Defendant Ocwen Loan Servicing, LLC ("Ocwen") submit the following joint status report regarding the remainder of discovery.

1. EMAILS

Ruiz's Position: Ruiz has withdrawn his request for any additional email searches from Ocwen's list of employees. With respect to Ocwen's search of the 24 employees that began on May 11, 2016, Ruiz would request that the Court impose a deadline of August 18, 2016 to produce those emails.

Ocwen's Position: Counsel for Ocwen is in regular contact with the department that is obtaining the emails. They have indicated that the process to restore the emails continues. We do not have a target date, but hope to provide an update at the next status hearing.

2. POLICIES AND PROCEDURES

Joint Position: Ocwen produced its policies and procedures on August 3, 2016. Ruiz will review the documents and confer with Ocwen prior to the August 15, 2016 status if additional policies and procedures are needed.

3. TREATING MEDICAL PROFESSIONALS

Joint Position: The parties have completed the depositions of three of Ruiz's six medical treaters (Dr. Winterfield, Dr. Tehrani, and Dr. Liszek). Another deposition is scheduled for August 24, 2016 (Dr. McCoyd). The parties are awaiting possible dates from the other two treaters (Dr. Samsi and Thapar) and expect to have these depositions completed by September 30, 2016. Ocwen is considering whether depositions of one or two additional treaters is necessary.

4. **EXPECTED TIME TO COMPLETE DISCOVERY**

Joint Position: Ruiz is taking a second Rule 30(b)(6) deposition of Ocwen on September 13, 2016. The parties expect to complete all fact discovery by September 30, 2016.

5. **TRIAL DATE**

Ruiz's Position: Ruiz requests a trial date sometime between October and December 2016.

Ocwen's Position: Ocwen requests time to address summary judgment prior to scheduling a trial date.

Dated: August 4, 2016

Renee Elvira & Edwin Ruiz

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